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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THE
PARTIES' JOINT DISCOVERY LETTER**

Pursuant to Civil Local Rules 79-5 and 7-11, and the Stipulated Protective Order entered by the Court on August 17, 2018 (ECF No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal. Specifically, Plaintiffs move for leave to file under seal the following document:

- Joint Discovery Letter regarding FTC Search Terms and Custodians (“Joint Letter”).

Plaintiffs move for leave to file the Joint Letter under seal because the Letter contains specific reference on Page 2, Paragraph 2, to documents that defendant Facebook, Inc. has designated “Confidential” pursuant to the Protective Order. *See* accompanying Declaration of Anne K. Davis (“Davis Decl.”), ¶ 5. Although Facebook designated this information as Confidential, the Plaintiffs have no objection to sealing this information at this time given that the settlement between the Federal Trade Commission (“FTC”) and Facebook remains pending before the United States District Court for the District of Columbia. *United States of America v. Facebook, Inc.*, Case No. 1:19-CV-02184 (D.D.C.).

Consistent with Rule 79-5(e), Facebook, as the Designating Party, must file a declaration as required by subsection 79-5(d)(1)(A) establishing that all of the designated material is sealable, or the information at issue will be made part of the public record. Pursuant to this Court’s Standing Order, the document at issue has been provided to the Court by appropriately filing it electronically under seal in an unredacted form. Standing Order for Civil Cases Before Judge Vince Chhabria ¶ 32.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: March 10, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser
Derek W. Loeser

BLEICHMAR FONTI & AULD LLP

By: /s/ Lesley E. Weaver
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of March, 2020, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on March 10, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Lesley E. Weaver

Lesley E. Weaver